

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

United States District Court  
Southern District of Texas  
FILED

MAY 17 2016

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

GUILLERMO VEGA, JR.

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§  
§

Criminal No. B-15-1012-S1

**SUPERSEDING**  
**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

On or about the dates below, in the Brownsville Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

**GUILLERMO VEGA, JR.**

did willfully attempt to evade and defeat a large part of the income tax due and owing by him to the United States of America for the following calendar years by preparing and causing to be prepared, and by signing and causing to be signed, false and fraudulent U.S. Individual Income Tax Returns, IRS forms 1040, for each of the following years, which were filed with the Internal Revenue Service on or about the following dates, wherein defendant claimed the following approximate amounts of taxable income and income taxes due and owing, whereas, as defendant then and there well knew, defendant in fact had the following approximate true amounts of taxable income for each year, upon which the following approximate true amounts of income taxes were due and owing, and defendant still owes the following additional income tax due for each of the following years:

| Count | Year | Date Filed | Claimed Taxable Income | True Taxable Income | Claimed Tax Owed | True Tax Owed | Additional Tax Due |
|-------|------|------------|------------------------|---------------------|------------------|---------------|--------------------|
| 1     | 2011 | 10/15/2012 | \$9,630.00             | \$378,446.00        | \$4,337.00       | \$128,908.00  | \$126,253.00       |

In violation of Title 26, United States Code, Section 7201.

**COUNT TWO**

On or about October 15, 2012, in the Southern District of Texas and elsewhere and within the jurisdiction of the Court, the Defendant,

**GUILLERMO VEGA, JR.**

a resident of Brownsville, Texas, did willfully make and subscribe a U.S. Individual Income Tax Return for the calendar year 2011, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter in that said U.S. Individual Income Tax Return for the calendar year 2011, which was prepared and signed in the Southern District of Texas and was filed with the Internal Revenue Service, stated a material misrepresentation of his earnings for that year creating a tax deficiency owed to the United States Government, whereas he then and there knew his true earnings were in excess of those claimed.

In violation of Title 26, United States Code, Section 7206(1).

**COUNT THREE**

On or about July 3, 2012, in the Southern District of Texas and elsewhere and within the jurisdiction of the Court, the defendant,

**GUILLERMO VEGA, JR.**

operated a trade or business, as defined in Title 31, Code of Federal Regulations, Section 1010.330(c)(11), and knowingly and willfully filed a false Report of Cash Payments over \$10,000 Received in a Trade or Business, FinCEN Form 8300, corresponding to the receipt in or about November 2011 of more than \$10,000 U.S. currency related to a single sale, to wit, the representation of Jose Luis Zuniga, as required by Title 31, United States Code, Section 5331, and the regulations promulgated thereunder.

In violation of Title 31, United States Code, Sections 5331 and 5322.

**COUNT FOUR**

On or about July 3, 2012, in the Southern District of Texas and within the jurisdiction of the Court, the defendant,

**GUILLERMO VEGA, JR.**

operated a trade or business, as defined in Title 31, Code of Federal Regulations, Section 1010.330(c)(11), and knowingly and willfully filed a false Report of Cash Payments over \$10,000 Received in a Trade or Business, FinCEN Form 8300, corresponding to the receipt in or about November 2011 of more than \$10,000 U.S. currency related to a single sale, to wit, the representation of Jose Luis Duenes, as required by Title 31, United States Code, Section 5331, and the regulations promulgated thereunder.

In violation of Title 31, United States Code, Sections 5331 and 5322.

**COUNT FIVE**

On or about July 3, 2012, in the Southern District of Texas and within the jurisdiction of the Court, the defendant,

**GUILLERMO VEGA, JR.**

operated a trade or business, as defined in Title 31, Code of Federal Regulations, Section 1010.330(c)(11), and knowingly and willfully filed a false Report of Cash Payments over \$10,000 Received in a Trade or Business, FinCEN Form 8300, corresponding to the receipt in or about November 2011 of more than \$10,000 U.S. currency related to a single sale, to wit, the representation of Armando Arismendi, as required by Title 31, United States Code, Section 5331, and the regulations promulgated thereunder.

In violation of Title 31, United States Code, Sections 5331 and 5322.

**COUNT SIX**

On or about August 31, 2012, in the Southern District of Texas and within the jurisdiction of the Court, the defendant,

**GUILLERMO VEGA, JR.**

operated a trade or business, as defined in Title 31, Code of Federal Regulations, Section 1010.330(c)(11), and knowingly and willfully filed a false Report of Cash Payments over \$10,000 Received in a Trade or Business, FinCEN Form 8300, corresponding to the receipt in or about November 2011 of more than \$10,000 U.S. currency related to a single sale, to wit, the representation of Juan Rincon, as

required by Title 31, United States Code, Section 5331, and the regulations promulgated thereunder.

In violation of Title 31, United States Code, Sections 5331 and 5322.

**COUNT SEVEN**

On or about March 21, 2011 in the Southern District of Texas and within the and within the jurisdiction of the Court, the defendant,

**GUILLERMO VEGA, JR.**

operated a trade or business, as defined in Title 31, Code of Federal Regulations, Sec section 1010.330(c)(11), and knowingly and willfully failed to file a Report of Cash Payments over \$10,000 Received in a Trade or Business, FinCEN Form 8300, corresponding to the receipt on or about March 21, 2011 of more than \$10,000 U.S. currency related to a single sale, to wit, the representation of Heriberto Bazan, as required by Title 31, United States Code, Section 5331, and the regulations promulgated thereunder.

In violation of Title 31, United States Code, Sections 5331 and 5322.

**COUNT EIGHT**

In or about January 2013 in the Southern District of Texas and within the and within the jurisdiction of the Court, the defendant,

**GUILLERMO VEGA, JR.**

operated a trade or business, as defined in Title 31, Code of Federal Regulations, Sec section 1010.330(c)(11), and knowingly and willfully failed to file a Report of Cash

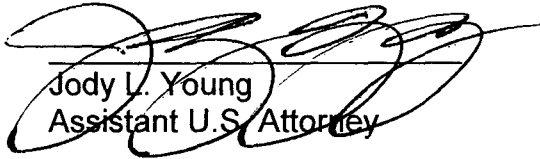
Payments over \$10,000 Received in a Trade or Business, FinCEN Form 8300, corresponding to the receipt in or about January 2013 of more than \$10,000 U.S. currency related to a single sale, to wit, the representation of Omar Pinales AKA: Botas, as required by Title 31, United States Code, Section 5331, and the regulations promulgated thereunder.

In violation of Title 31, United States Code, Sections 5331 and 5322.

A True Bill:

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Foreperson of the Grand Jury

Kenneth Magidson  
United States Attorney

  
Jody L. Young  
Assistant U.S. Attorney